

Southern California Water Committee, Inc.

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JUN 01 1998

May 28, 1998

Mr. Lester Snow

Executive Director

CALFED Bay-Delta Program

1416 Ninth Street, Suite 1155

Sacramento, California 95814

Dear Mr. Snow:

Comments on Draft Programmatic EIS/EIR for the CALFED Bay-Delta Program

The Southern California Water Committee is a nonprofit, nonpartisan, coalition of county and city elected officials, agricultural and business leaders, water agency representatives, and private citizens with a mission to secure reliable, affordable, and high quality water supplies for California. We bring together stakeholders within Southern California to provide a forum for consensus and action. In the last fourteen years, the Water Committee has concentrated on educating government, community, agriculture and business leaders to assist them in informed decisions on water issues.

California has unprecedented opportunity for resource management of the state's water supplies that will offer reliability to all Californians — agricultural, environmental, and urban users. The Southern California Water Committee is strongly committed to the success of the CALFED Bay-Delta Program, recognizing that without a "fix" to the Delta, we will fail to provide all regions and sectors of our state with an affordable, reliable, and quality water future.

The CALFED Bay-Delta Program has focused on three alternative solutions to the long-term problems affecting the San Francisco Bay and Sacramento/San Joaquin Delta. In prior communications, the Southern California Water Committee has addressed the proposed solution alternatives and significant issues that must be addressed in the programmatic environmental review document. We have advocated that the preferred alternative meet a basic principle: Delta conditions must be created to meet current and future water needs, including exporting water in excess of that necessary to meet water quality objectives protecting all beneficial uses.

A cooperative effort of business, government, water agencies, agriculture, and public interests.

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The Southern California Water Committee has reviewed the Draft Programmatic EIS/EIR for the CALFED Bay-Delta Program and concurs with the conclusion that, based on the technical evaluations of the proposed three alternatives, Alternative 3 (dual Delta conveyance) has the greatest potential to satisfy the solution principles and program objectives.

The CALFED program analysis of the three proposed alternatives leads directly to Alternative 3 because it provides export water quality, limited diversion effects on fisheries, Delta flow circulation, water supply opportunities, operational flexibility, and less risk to export water supplies. The Southern California Water Committee agrees with the following conclusions:

- ▶ *Improved Water Quality* — Alternative 3 improves the quality of water diverted from the Delta and assists in protecting public health and the control of the costs of treatment and use, including use of wastewater reclamation and conjunctive groundwater programs. Higher quality water will allow water supplies to go further, resulting in less dependency on Delta water and lower associated costs.
- ▶ *Restored Ecosystem* — Alternative 3 provides a dual conveyance system which would permit management of flows to benefit aquatic habitats and allow for multiple uses of stream flows to serve both instream needs and diversion requirements.
- ▶ *Increased Water Supply Reliability* — Alternative 3 contains a full range of management measures to meet environmental needs and to provide opportunities to export water in excess of what is needed to meet water quality objectives.

The Southern California Water Committee is convinced that the challenges faced by Alternative 3 in terms of assurances and implementability can be firmly established. In fact, by its very nature, a dual conveyance system assures both water quality and fishery health.

Although complex by its nature, the basic tenet of an assurance package is that "we all get better together." SB 900 which provides funding for the CALFED Program and amends the California Water Code, Section 78684.12 specifies that the EIS/EIR will contain a "schedule of eligible projects" for funding and further specifies that this schedule is to "ensure that balanced solutions in all identified areas, including ecosystem restoration, water supply, water quality, and system integrity are achieved." The CALFED Program's implementation plan should link projects that meet the four basic objectives in a way that all objectives achieve benefits on an incremental basis.

Institutional changes can assure the proper implementation of Alternative 3. It is important that the implementation of the ecosystem features and programs move along with physical components for improved management of the water supply system. For example, the CALFED Program needs to evaluate the need and opportunities for early strategic land purchases for both the Environmental Restoration Program and for other components of the preferred alternative.

A structure for management of the implementation of the numerous projects also needs to be considered. An agency needs to establish an institutional framework for ensuring that balanced implementation moves ahead at the appropriate pace. For example, ecosystem restoration must be viewed as a long range endeavor to be accomplished through implementation, evaluation, and adjustment as the environment responds to the program. Institutional changes must give permanency to the CALFED structure and the CALFED paradigm of consensus management must ensure that a "deal is a deal."

Alternative 3 supports a key component of the CALFED program: efficient water management programs. Urban and agricultural programs need to be encouraged, but demand management should not be a fight to save water to meet all needs. Rather, it should be an agreement to manage water wisely. The proposed savings numbers by CALFED must not be used as numeric targets or threshold performance levels. The CALFED Program needs to utilize the best management practices (BMPs) for urban agencies and the efficient water management practices (EMPs) for agricultural agencies on a cost-effective implementation basis. Volumetric targets for specific regions, enforced by delays in CALFED implementation or imposition of water-based sanctions, must be avoided.

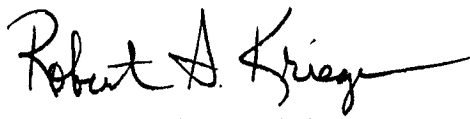
Southern California is already a leader in conservation. This region currently saves more than 48,000 acre-feet per year; 90% of the water savings is due to ultra low flush toilets. In a region that includes 16 million people, from 1989 to 1997, 3.5 million showerheads have been installed and 1.2 million ULF toilets. The cumulative savings of all the devices over a twenty-year life is estimated at 920,000 acre-feet.

Finally, the Southern California Water Committee believes that Alternative 3 should not be eliminated just because of higher costs if it creates a permanent fix to the Delta. Recognizing the national and statewide interests in restoring, preserving, and enhancing the environmental conditions in the Delta, financing solutions for ecosystem restoration need to draw on sources of funding from the public through State and federal means. The portion of the solution financed by local interests must be formulated with regard to time span and interest rates to assure only moderate impacts on water rates. The approach to financing Delta improvements must be based on a benefits, not causation approach.

Mr. Lester Snow
CALFED Bay-Delta Program
May 28, 1998
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The Southern California Water Committee appreciates having had the opportunity to participate and provide comments to the CALFED Program throughout its development; however, **we strongly encourage CALFED to move expeditiously in selecting a preferred alternative and conducting the necessary studies at the earliest opportunity.** The Southern California Water Committee continues to look to the CALFED Program as the best means of resolving the issues and achieving the objective of a Delta "fix." We therefore urge you to keep to a schedule that will produce a final EIS/EIR by year's end.

Very truly yours,



Robert A. Krieger, Chairman
Southern California Water Committee



Stephen A. Zapotichny, Chair
Bay-Delta Advisory Task Force

cc: Board of Trustees

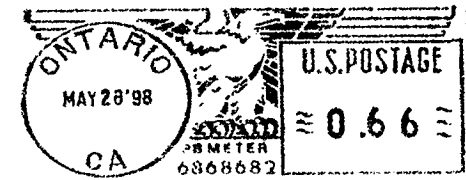
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